

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**MEMORANDUM**

8/28/2019

**SUBJECT:** Product Chemistry Review for CDG Solution 3000 EPA Reg. No.: 75757-2

**FROM:** Lynette T. Umez-Eronini

Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**THRU:** Karen P. Hicks, Team Leader

Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**TO:** Demson Fuller, PM Team 32 / Melanie Bolden  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Registrant: CDC  
Environmental LLC  
Action code: 362  
Agency Due Date:  
8/8/2019  
DP No.: 453800  
Submission No.: 1034674  
E-Sub No.: 39199  
Classification: EP  
Process: Nonintegrated  
system  
Pesticide type:  
Disinfectant

MRID(s):N/A

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
020503	10049-04-4	Chlorine dioxide	.3
		Other Ingredients	99.7
		Total	100%

**I. BACKGROUND**

The Registrant, CDC Environmental LLC, has submitted a minor formulation amendment for their product: CDG Solution 3000 EPA Reg. No. 75757-2. The amendment is to add two additional registered sources of the active ingredient.

## II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-1 Application for Pesticide Registration (1/4/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-27 – Formulator’s Exemption Statement	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-34 – Certification with Respect to Citation of Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-35 – Data Matrix	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Cover letter (5/10/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Proposed CSF ALTERNATE 1, (1/4/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label,	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
REFERENCED: CSF BASIC , (7/12/2006) unsigned	--	
REFERENCED: LABEL, (12/14/2018)	--	
Comments:		

## III. FINDINGS

### a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Active Ingredients(s)			Nominal	Upper limit	Lower limit
Chlorine dioxide			0.3%	0.33%	0.24%
			YES	NO	N/A
1. The certified limits of all ingredients are within 40 CFR standard certified limits.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Wider certified limits were requested and rationale was accepted.			<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. The nominal concentration(s) of the active ingredient is in agreement with the label.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	

4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**b. Product Label:**

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**IV. Additional Findings**

1. Alternate CSF dated 8/27/2019 is acceptable.

**V. Conclusion**

The Product Science Branch of Antimicrobials Division finds Alternate 1 CSF dated 8/27/2019 to be acceptable.

# CONFIDENTIAL ATTACHMENT

1. A current Basic CSF was not found in the jacket. An unsigned Basic CSF dated July 10, 2006 was found in an e-jacket (Barcode 9266989) and is used as a reference CSF.

